

EPA

March 2006

## RCRAInfo CM&amp;E EVALUATION – VIOLATION FORM

|   |                 |   |   |   |                 |       |  |
|---|-----------------|---|---|---|-----------------|-------|--|
| *EPA ID Number  |                 | PA0982577082  |   | EIN   |                 |       |  |
| Handler Name  |                 | KOPPERS INC. Monessen Coke  |   |   |                 |       |  |
| Street  |                 | 345 Donner Ave.   |   |   |                 |       |  |
| City  |                 | Monessen  |   | State   |                 | PA    |  |
|   |                 |   |   | Zip Code  |                 | 15062 |  |
| Actual Generator Status<br><small>Check only if different from Notified Status.</small>   |                 |   |   | LQG <input type="checkbox"/> SQG <input type="checkbox"/> CESQG <input type="checkbox"/> Closed <input type="checkbox"/> Non-Handler <input type="checkbox"/> |                 |       |  |
| Universe Change Required?<br><small>(Generator Status Change Required)</small>  |                 |   |   | YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Universe Change Section (on reverse side of this form).              |                 |       |  |
| RCRA Non-Notifier?  |                 |   |   | YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).                      |                 |       |  |
| Other Facility Information Changes?   |                 |   |   | YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).                      |                 |       |  |
| *EVALUATION   |                 | <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete |   | You must provide an Evaluation Identifier (also known as the Sequence Number).  |                 |       |  |
| *Evaluation Identifier  | *Type           | *Evaluation Start Date<br><small>(mm/dd/yyyy)</small>   | *Agency   | Responsible Person  | Suborganization |       |  |
|   | CEI             | 06/05/2007  | S   | GS  | wm              |       |  |
| Day Zero (mm/dd/yyyy):<br>You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNY, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNY evaluations, you must select a previous CEI Start Date for the Day Zero. SNN evaluation type does not require a Day Zero.  |                 |   |   | 6/6/07<br>Reclassified SV Date:<br>Only applicable for SNY evaluation type as appropriate.  |                 |       |  |
| Notes: no violations  |                 |   |   |   |                 |       |  |
| Evaluation Indicator Field (Check all that apply)<br><input type="checkbox"/> Citizen Complaint <input type="checkbox"/> Multimedia Inspection <input type="checkbox"/> Sampling <input type="checkbox"/> Not Subtitle C  |                 |   |   |   |                 |       |  |
| Focused Coverage Areas (Use Only for Evaluation Type FCI)<br>Regulation-Specific FCI<br>BIF <input type="checkbox"/> CCI <input type="checkbox"/> CFI <input type="checkbox"/> INC <input type="checkbox"/> LDR <input type="checkbox"/> PTB <input type="checkbox"/> PTX <input type="checkbox"/><br>THI <input type="checkbox"/> UIC <input type="checkbox"/> UOI <input type="checkbox"/> UWR <input type="checkbox"/> OTHER (specify): _____<br>Routine/Standardized FCI<br>CAR <input type="checkbox"/> CPC <input checked="" type="checkbox"/> DOS <input type="checkbox"/> EMR <input type="checkbox"/> IEI <input type="checkbox"/> ISI <input type="checkbox"/> RTI <input type="checkbox"/> |                 |   |   |   |                 |       |  |
| Does this Evaluation Add/Update/Delete a Violation?   |                 | YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>                                     |   | If Yes, fill in the Violations Section(s) on page 2 of this form.   |                 |       |  |
| Does this Evaluation link to a Commitment?  |                 | YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>                                     |   | If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.   |                 |       |  |
| Does this Evaluation link to a 3007 Request?  |                 | YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>                                     |   | If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.   |                 |       |  |
| OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If Yes, fill in information below.  |                 |   |   |   |                 |       |  |
| *Seq. No.   | *Violation Type | *Agency   | *Regulation Citation<br><small>(Type + Citation)<br/>(ex. FR 262.1)</small> | *Date Determined<br><small>(mm/dd/yyyy)</small>   |                 |       |  |
|   |                 |   |   |   |                 |       |  |
|   |                 |   |   |   |                 |       |  |
|   |                 |   |   |   |                 |       |  |
|   |                 |   |   |   |                 |       |  |
|   |                 |   |   |   |                 |       |  |
|   |                 |   |   |   |                 |       |  |

\*Required Fields

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COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

Emp ID# 1627544 - S.F. 393746  
1622545 - S.F. 393748  
Inspection Date 6/6/07

Time Start 0900

Time Finish 1230

## HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATOR

Company name KOPPERS INC.  
EPA I.D. Number PAD 982577082 Employer I.D. Number (EIN) \_\_\_\_\_  
Site Address 345 DOWNER AVE Monessen, PA.  
County WESTMORELAND Municipality Monessen Zip 15062  
Name of Inspector GEORGE SABOCHICK  
Name & Title of Responsible Official ROBERT RUSSELL  
Person Interviewed GREG SHAMITKO Telephone (724) 684-1009  
Mailing Address (if different from above) same  
Amount of Hazardous Waste Generated per Month: ~ 9,000 Pounds \_\_\_\_\_ Kgs

## 1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other \_\_\_\_\_PBR: ☐ Neutralization/WWTP ☒ Reclaim Other \_\_\_\_\_GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity HandlerUniversal Waste Types WM

## 3. Hazardous Waste Transporters:

Transporter Name SAFETY KLEEN License Number TX2000010930  
Transporter Name DART TRK License Number OH0 009861820-  
Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

## 4. Types of hazardous waste generated and destination facility (location &amp; type).

| Waste Code | Waste Description        | Destination Facility |
|------------|--------------------------|----------------------|
| K087       | COAL TAR DECANTER Sludge | CLEAN HARBOR S       |
| D001       | WASTE WATERS             | SAFETY KLEEN         |
|            |                          |                      |
|            |                          |                      |
|            |                          |                      |
|            |                          |                      |
|            |                          |                      |
|            |                          |                      |

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DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name KOPPERS ID Number PA098257708 Date 6/1/2007

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

### STATUS

| 1 | 2 | 3 | 4 | REQUIREMENT   | PA CIT.<br>25 PA Code | FED. CIT.<br>40 CFR       | LINE<br>NO. |
|---|---|---|---|---|-----------------------|---------------------------|-------------|
| X |   |   |   | Hazardous waste determination performed on all waste streams                                    | 262a.10               | 262.11                    | H001        |
| X |   |   |   | Identification Number   | 262a.10               | 262.12                    | H002        |
| X |   |   |   | Authorized transporters only  | 262a.10               | 262.12(c)                 | H003        |
| X |   |   |   | Subsequent notification requirements met  | 262a.12(b)            |                           | H004        |
| X |   |   |   | Proper manifest used  | 262a.10               | 262.21                    | H005        |
| X |   |   |   | Manifests filled out correctly and completely   | 262a.20               |                           | H006        |
| X |   |   |   | Manifests signed and routed properly  | 262a.23(a)            | 262.23                    | H007        |
| X |   |   |   | Generator waste accumulated on site for 90 days or less   | 262a.10               | 262.34(a)                 | H008        |
|   | X |   |   | SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days | 262a.10               | 262.34(e)(f)              | H009        |
|   | X |   |   | SQG waste accumulated on-site never exceeds 6000 kg   | 262a.10               | 262.34(e)(f)              | H010        |
| X |   |   |   | Satellite accumulation requirements complied with   | 262a.10               | 262.34(c)                 | H011        |
| X |   |   |   | Personnel training program per 265.16 complied with   | 262a.10               | 262.34(a)(4)<br>262.34(d) | H012        |
| X |   |   |   | Manifest exception and biennial reports retained for 3 years                                    | 262a.10               | 262.40(a)(b)              | H013        |
| X |   |   |   | Specified records retained for three years  | 262a.10               | 262.40(c)                 | H014        |
| X |   |   |   | Biennial reports submitted to the Department (LQG only)   | 262a.41               | 262.41                    | H015        |
|   | X |   |   | Exception reporting procedures followed   | 262a.42               | 262.42                    | H016        |
| X |   |   |   | Spill reporting procedures followed   | 262a.43               | 262.34(d)                 | H017        |
| X |   |   |   | PPC plan developed and implemented  | 262a.10               | 262.34(a)                 | H018        |
|   | X |   |   | Special requirements followed for international shipments                                       | 262a.10               | 262.50<br>262.60          | H019        |
| X |   |   |   | Source reduction strategy prepared and available (LQG only)                                     | 262a.100              |                           | H020        |
| X |   |   |   | Excluded waste complies with exclusionary requirements  | 261a.4                | 261.4                     | H021        |

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DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT  
GENERATORS -- SMALL QUANTITY GENERATORS  
FACILITY SPECIFICS

Site Name KOPPERS ID Number PAD 98 J7708 Date 6/6/2007  
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

## STATUS

| 1 | 2 | 3 | 4 | REQUIREMENT  | PA CIT.<br>25 PA CODE | FED CIT.<br>40 CFR | LINE<br>NO. |
|---|---|---|---|--|-----------------------|--------------------|-------------|
|   |   |   |   | <b>LQG TANKS (Subchapter J)</b>  |                       |                    |             |
|   |   |   |   | <i>K087</i><br>Tanks labeled "Hazardous Waste" <i>(COAL TAR (CANTER Sludge tank))</i>                              | 262a.10               | 262.34(a)(3)       | H040        |
|   |   |   |   | Written certification by registered professional engineer for proper tank (system) design and installation on file | 262a.10               | 265.192(a)         | H041        |
|   |   |   |   | Secondary containment provided for tanks (systems) as required   | 265a.193              | 265.193            | H042        |
|   |   |   |   | Tanks (systems) managed to prevent rupture, leak, corrode or fail  | 265a.1                | 265.194            | H043        |
|   |   |   |   | Tanks labeled to accurately identify contents  | 265a.194              |                    | H044        |
|   |   |   |   | Required inspections completed and documented in operating log   | 265a.195              | 265.195            | H045        |
|   |   |   |   | Release reported to Department within 24 hours, unless exempted  | 265a.1                | 265.196            | H046        |
|   |   |   |   | Special requirements for ignitable and reactive wastes followed  | 265a.1                | 265.198            | H047        |
|   |   |   |   |  |                       |                    |             |
|   |   |   |   | <b>SQG TANKS</b>   |                       |                    |             |
|   |   |   |   | Waste contents compatible with tank  | 265a.1                | 265.201(b)(2)      | H051        |
|   |   |   |   | Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity                               | 265a.1                | 265.201(b)(3)      | H052        |
|   |   |   |   | If continuously fed, tank has method to stop inflow  | 265a.1                | 265.201(b)(4)      | H053        |
|   |   |   |   | Daily tank inspection requirements complied with   | 265a.1                | 265.201(c)(1-3)    | H054        |
|   |   |   |   | Weekly tank inspection requirements complied with  | 265a.1                | 265.201(c)(4,5)    | H055        |
|   |   |   |   | All waste removed at closure   | 265a.1                | 265.201(d)         | H056        |
|   |   |   |   | Special requirements for ignitable or reactive waste complied with   | 265a.1                | 265.201(e)(1)      | H057        |
|   |   |   |   | Covered tank buffer zone requirements complied with  | 265a.1                | 265.201(e)(2)      | H058        |
|   |   |   |   | Incompatible waste requirements met  | 265a.1                | 265.201(f)         | H059        |

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## INSPECTION REPORT COMMENTS

Date of Inspection 6/6/2007

Identification Number PAO 982577082

Company/Facility/Site Name KOPPERS INC.

## Comments:

A Routine Hazardous Waste generator inspection was conducted w/ Gwy. SHAMITKO - MGR. ENVIRONMENTAL AFFAIRS for KOPPERS

NARRATIVE: Monessen Coke Plant is owned & operated by KOPPERS INC. THE FACILITY produces metallurgical grade coke for the STEEL industry. Coal TAR is generated during the destructive distillation of coal. The tar is collected from two batteries consisting of six Ovens - TAR is transported thru flushing system. TAR is separated at various locations. One location is the TAR DECANTER. Sludge is collected independently of the TAR & recycled back thru the system for the carbon content - this recycling is covered in the regulations under 26.4 - exclusionary requirements for K087 WASTE. Elemental Sulfur is collected from the GAS DESULFURATION system. Ammonium Sulfate

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed

Date 6/6/2007

Inspector

Date 6/6/2007

☐ White - Vendor☐ Yellow - Regional Office☐ Pink - Inspector



## INSPECTION REPORT COMMENTS

Date of Inspection

6/6/2007

Identification Number

PAD 982 577082

Company/Facility/Site Name

KOPPERS INC

## Comments:

Light oil are also produced. Sludge from the wastewater treatment process is also recycled into the coking process.

Hazardous waste manifests were reviewed for 2005, 2006, & 2007. Koppers is using the 'universal manifest' as required in Sept. 2006.

PPE Plan updated & reviewed.

Hazardous waste Biennial Report SUBMITTED

Waste minimization plan in effect - renewed 1/1/2007 - tracked monthly.

25 R's renewed

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed

(Signature)

Date

6/6/2007

Inspector

(Signature)

Date

6/6/2007



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

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### INSPECTION REPORT COMMENTS

Date of Inspection

6/6/2007

Identification Number

PA092577082

Company/Facility/Site Name

KOPPERS INC

Comments:

DECANTER TANK STORAGE AREA INSPECTED.  
Containment in effect: - SATELLITE  
Accumulation Area - CONTAINERS MARKED.  
Area clean & clear of debris.

PERSONNEL TRNG Program in effect for  
HAZ. WASTE. RCRA TRNG: CONDUCTED  
in excess of requirements.

PAyhouse Area inspected - no problems.

STORAGE AREAS INSPECTED - Insp. log included  
w/ report.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed

(Signature)

Date

6/6/2007

Inspector

(Signature)

Date

6/6/2007

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☐ Yellow - Regional Office

☐ Pink - Inspector



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# Roll Off Box Inspection Log 2007

| Date   | Box No. | Waste Type | Leakage (Y/N) | Accum Start Date | Comments       |
|--------|---------|------------|---------------|------------------|----------------|
| 3-Jan  | 414     | res        | n             |                  |                |
|        | 399     | res        | n             |                  |                |
|        | 313     | res        | n             |                  |                |
|        | 202     | res        | n             |                  |                |
|        | 202032  | haz        | n             |                  |                |
|        | 220405  | haz        | n             |                  |                |
| 10-Jan | 202032  | haz        | n             |                  |                |
|        | 220405  | haz        | n             |                  |                |
| 17-Jan | 202032  | haz        | n             |                  |                |
|        | 220405  | haz        | n             |                  |                |
| 26-Jan | 220405  | haz        | n             |                  |                |
| 1-Feb  | 220405  | haz        | n             |                  | by Scott Wolfe |
| 6-Feb  | 220405  | haz        | n             |                  |                |
| 12-Feb | 220407  | haz        | n             |                  |                |
| 20-Feb | 220407  | haz        | n             |                  |                |
|        | 414     | res        | n             |                  |                |
|        | 399     | res        | n             |                  |                |
|        | 313     | res        | n             |                  |                |
|        | 202     | res        | n             |                  |                |
| 1-Mar  | 220407  | haz        | n             |                  |                |
| 8-Mar  | none    | haz        |               |                  |                |
| 12-Mar | none    | haz        |               |                  |                |
| 20-Mar | none    | haz        |               |                  |                |
| 28-Mar | none    | haz        |               |                  |                |
|        | 414     | res        | n             |                  |                |
|        | 399     | res        | n             |                  |                |
|        | 313     | res        | n             |                  |                |
|        | 202     | res        | n             |                  |                |
| 2-Apr  | none    | haz        |               |                  |                |
| 11-Apr | none    | haz        |               |                  |                |
| 18-Apr | none    | haz        |               |                  |                |
| 26-Apr | none    | haz        |               |                  |                |
|        | 414     | res        | n             |                  |                |
|        | 399     | res        | n             |                  |                |
|        | 313     | res        | n             |                  |                |
|        | 202     | res        | n             |                  |                |
| 1-May  | none    | haz        |               |                  |                |
| 7-May  | none    | haz        | n             |                  |                |
| 15-May | none    | haz        | n             |                  |                |
| 21-May | none    | haz        | n             |                  |                |
|        | 414     | res        | n             |                  |                |
|        | 399     | res        | n             |                  |                |
|        | 313     | res        | n             |                  |                |
|        | 202     | res        | n             |                  |                |
| 31-May | none    | haz        | n             |                  |                |
| 4-Jun  | 414     | res        | n             |                  |                |
|        | 399     | res        |               |                  |                |
|        | 313     | res        |               |                  |                |
|        | 202     | res        |               |                  |                |
|        | none    | haz        | ro 220232     |                  |                |





COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

RD# 1273824 S.F. 393746

RD# 1273832 S.F. 393748

Inspection Date 9/24/03

Time Start 0900

Time Finish 1200

## HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR ☐ S Q GENERATOR

Company name KOPPERS INDUSTRIES, INC. I.D. Number PA0982577082  
 Site Address 345 Donner Ave Monessen, PA.  
 County WESTMORELAND Municipality Monessen Zip 15062  
 Name of Inspector George SABOCHICK  
 Name & Title of Responsible Official Jim BURKHART - PLANT MGR.  
 Person Interviewed GREG SHAMITKO Telephone (724) 684-1009  
 Mailing Address (if different from above) Same

Amount of Hazardous Waste Generated per Month: DOO1 ~ 4000 Pounds 131,000 lbs. K087 (2002) Kgs

### 1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other \_\_\_\_\_

PBR: ☐ Neutralization/WWTP ☒ Reclaim Other \_\_\_\_\_

GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

### 2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types \_\_\_\_\_

### 3. Hazardous Waste Transporters:

Transporter Name DART TRUCKING CO, INC. License Number PA-AH 0219

Transporter Name SAFETY Klen License Number PA-AH 0172

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

### 4. Types of hazardous waste generated and destination facility (location & type).

| Waste Code | Waste Description                   | Destination Facility   |
|------------|-------------------------------------|--|
| K087       | soil CONTAMINATED w/ deconts sludge | PERMA-FLEX (TSA) <sup>BROWN STU W K</sup><br><sub>INC.</sub> |
| DOO1/DO39  | spent SOLVENT (PARTS WASHING)       | SAFETY Klen  |
|            |                                     |  |
|            |                                     |  |
|            |                                     |  |
|            |                                     |  |
|            |                                     |  |
|            |                                     |  |

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name KOPPERS ID Number PA0982577082 Date 9/24/03

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

### STATUS

| 1 | 2 | 3 | 4 | REQUIREMENT   | PA CIT.<br>25 PA Code | FED. CIT.<br>40 CFR       | LINE<br>NO. |
|---|---|---|---|---|-----------------------|---------------------------|-------------|
| X |   |   |   | Hazardous waste determination performed on all waste streams                                    | 262a.10               | 262.11                    | H001        |
| X |   |   |   | Identification Number   | 262a.10               | 262.12                    | H002        |
| X |   |   |   | Authorized transporters only  | 262a.10               | 262.12(c)                 | H003        |
| X |   |   |   | Subsequent notification requirements met  | 262a.12(b)            |                           | H004        |
| X |   |   |   | Proper manifest used  | 262a.10               | 262.21                    | H005        |
| X |   |   |   | Manifests filled out correctly and completely   | 262a.20               |                           | H006        |
| X |   |   |   | Manifests signed and routed properly  | 262a.23(a)            | 262.23                    | H007        |
| X |   |   |   | Generator waste accumulated on site for 90 days or less   | 262a.10               | 262.34(a)                 | H008        |
|   | X |   |   | SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days | 262a.10               | 262.34(e)(f)              | H009        |
|   | X |   |   | SQG waste accumulated on-site never exceeds 6000 kg   | 262a.10               | 262.34(e)(f)              | H010        |
| X |   |   |   | Satellite accumulation requirements complied with   | 262a.10               | 262.34(c)                 | H011        |
| X |   |   |   | Personnel training program per 265.16 complied with   | 262a.10               | 262.34(a)(4)<br>262.34(d) | H012        |
| X |   |   |   | Manifest exception and biennial reports retained for 3 years                                    | 262a.10               | 262.40(a)(b)              | H013        |
| X |   |   |   | Specified records retained for three years  | 262a.10               | 262.40(c)                 | H014        |
| X |   |   |   | Biennial reports submitted to the Department (LQG only)   | 262a.41               | 262.41                    | H015        |
|   | X |   |   | Exception reporting procedures followed   | 262a.42               | 262.42                    | H016        |
| X |   |   |   | Spill reporting procedures followed   | 262a.10               | 262.34(d)                 | H017        |
| X |   |   |   | PPC plan developed and implemented  | 262a.10               | 262.34(a)                 | H018        |
|   | X |   |   | Special requirements followed for international shipments                                       | 262a.10               | 262.50<br>262.60          | H019        |
| X |   |   |   | Source reduction strategy prepared and available (LQG only)                                     | 262a.100              |                           | H020        |
| X |   |   |   | Excluded waste complies with exclusionary requirements  | 261a.4                | 261.4                     | H021        |
|   |   |   |   |   |                       |                           |             |
|   |   |   |   |   |                       |                           |             |
|   |   |   |   |   |                       |                           |             |
|   |   |   |   |   |                       |                           |             |

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT  
GENERATORS -- SMALL QUANTITY GENERATORS  
FACILITY SPECIFICS**

Site Name KOPPERS ID Number PAD 982577082 Date 9/24/03

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

**STATUS**

| 1 | 2 | 3 | 4 | REQUIREMENT  | PA CIT.<br>25 PA Code      | FED CIT.<br>40 CFR | LINE<br>NO. |
|---|---|---|---|--|----------------------------|--------------------|-------------|
|   |   |   |   | <b>CONTAINERS (Subchapter I)</b>   |                            |                    |             |
|   | X |   |   | Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I               | 262a.10                    | 262.34             | H025        |
|   | X |   |   | Containers of hazardous waste in good condition  | 265a.1                     | 265.171            | H026        |
|   | X |   |   | Containers and stored waste compatible   | 265a.1                     | 265.172            | H027        |
|   | X |   |   | Containers kept closed except during addition or removal of wastes   | 265a.1                     | 265.173(a)         | H028        |
|   | X |   |   | Containers managed to prevent leaks  | 265a.1                     | 265.173(b)         | H029        |
|   | X |   |   | Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment | 265a.173                   |                    | H030        |
|   | X |   |   | Container storage areas inspected at least weekly  | 265a.1                     | 265.174            | H031        |
|   | X |   |   | Special requirements for ignitable or reactive and incompatible waste complied with                                    | 265a.1                     | 265.176-177        | H032        |
|   | X |   |   | Proper containment and collection systems in place   | 265a.179                   |                    | H033        |
|   | X |   |   | Air emission standards complied with (AA, BB, CC)  | 265a.1                     | 265.178            | H034        |
|   | X |   |   | Containers clearly marked with accumulation date and visible for inspection  | 262a.10                    | 262.34(a)(2)       | H035        |
|   | X |   |   | Containers labeled "Hazardous Waste"   | 262a.10                    | 262.34(a)(3)       | H036        |
|   | X |   |   | Containers labeled accurately identify contents  | SWMA<br>6018.403(b)<br>(2) |                    | H037        |

NO CONTAINER STORAGE AT TIME OF INSPECTION

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|---|---|---|---|---|-----------------------|--------------------|-------------|
|   |   |   |   | <b>LQG TANKS (Subchapter J)</b>   |                       |                    |             |
|   | X |   |   | Tanks labeled "Hazardous Waste" <i>coal tar drums</i>   | 262a.10               | 262.34(a)(3)       | H040        |
|   | X |   |   | Written certification by registered professional engineer <i>storage tanks</i> for proper tank (system) design and installation on file | 262a.10               | 265.192(a)         | H041        |
| X |   |   |   | Secondary containment provided for tanks (systems) as required  | 265a.193              | 265.193            | H042        |
| X |   |   |   | Tanks (systems) managed to prevent rupture, leak, corrode or fail   | 265a.1                | 265.194            | H043        |
| X |   |   |   | Tanks labeled to accurately identify contents   | 265a.194              |                    | H044        |
|   | X |   |   | Required inspections completed and documented in operating log  | 265a.195              | 265.195            | H045        |
|   | X |   |   | Release reported to Department within 24 hours, unless exempted   | 265a.1                | 265.196            | H046        |
|   | X |   |   | Special requirements for ignitable and reactive wastes followed   | 265a.1                | 265.198            | H047        |
|   | X |   |   | Special small quantity generator requirements   | 265a.1                | 265.201            | H048        |
|   |   |   |   |   |                       |                    |             |
|   |   |   |   | <b>SQG TANKS</b>  |                       |                    |             |
|   |   |   |   | Waste contents compatible with tank   | 265a.1                | 265.201(b)(2)      | H051        |
|   |   |   |   | Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity  | 265a.1                | 265.201(b)(3)      | H052        |
|   |   |   |   | If continuously fed, tank has method to stop inflow   | 265a.1                | 265.201(b)(4)      | H053        |
|   |   |   |   | Daily tank inspection requirements complied with  | 265a.1                | 265.201(c)(1-3)    | H054        |
|   |   |   |   | Weekly tank inspection requirements complied with   | 265a.1                | 265.201(c)(4,5)    | H055        |
|   |   |   |   | All waste removed at closure  | 265a.1                | 265.201(d)         | H056        |
|   |   |   |   | Special requirements for ignitable or reactive waste complied with  | 265a.1                | 265.201(e)(1)      | H057        |
|   |   |   |   | Covered tank buffer zone requirements complied with   | 265a.1                | 265.201(e)(2)      | H058        |
|   |   |   |   | Incompatible waste requirements met   | 265a.1                | 265.201(f)         | H059        |
|   |   |   |   |   |                       |                    |             |
|   |   |   |   |   |                       |                    |             |

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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 9/24/03 Identification Number PAD 982577082

Company/Facility/Site Name KOPPERS

A hazardous waste generator inspection was conducted at Koppers Industries, Inc. on 9/24/03 with Greg Shamitko (Director of environmental affairs).

NARRATIVE:

The Monessen Coke Plant is owned & operated by Koppers Industries Inc. (KII). The plant's primary business is the manufacture of metallurgical grade COKE for the steel industry. Coal tar is produced during the destructive distillation of coal. The tar is collected from the coke batteries which consists of two batteries w/ 130 ovens and then transported thru the flashing liquor system. Tar is separated from the flashing liquor and gas at several locations. One location is the tar decanter. The sludge is collected independently of the tar and recycled back thru the system for the carbon content. This is covered in Regs under 26.14 - extraordinary requirements for K087 wastes. Elemental sulfur is collected from the Gas Desulfurization & Claus system. Ammonium sulfate & light oil are also produced during the H<sub>2</sub> & light oil removal process. Sludge from wastewater treatment is also recycled back into coke producing process.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed

Date

Inspector

(Signature)  
Greg Shamitko  
(Signature)

Date 9/24/03



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DEPARTMENT OF ENVIRONMENTAL PROTECTION  
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**INSPECTION REPORT COMMENTS**

Date of Inspection 9/24/03 Identification Number PAD982577082  
Company/Facility/Site Name Koppers

Hazardous wastes generated at Koppers consist of soil contaminated w/ Tan Sludge (K087) and spent solvent from parts cleaning.

Hazardous waste manifests were renewed for 2002 + 2003 up till present. All renewed copies + information present.

Personnel training program in effect at facility.

Biennial report submitted.

PPC Plan updated.

Source reduction strategy reviewed.

Decanter tank storage area inspected. Containment area clean.

BAG House Area inspected. Area clean & good shape. Coke fines are sold.

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Person Interviewed

Date

Inspector

[Signature]  
(Signature)

Date

9/24/03




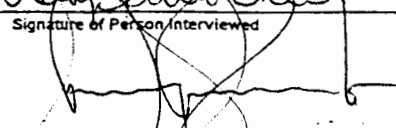
|   |                              |  |
|---|------------------------------|--|
| Department of<br>Environmental Protection | GENERAL<br>INSPECTION REPORT | Bureau of Land Recycling<br>and Waste Management |
|---|------------------------------|--|

|   |   |                                 |                                |
|---|---|---------------------------------|--------------------------------|
| Type of Inspection<br>Complaint - hazardous                                 | WM Identification Number<br>PAD 982 577 082 | Entry Time/Date<br>0915 1/11/01 | Exit Time/Date<br>1500 1/11/01 |
| Facility/Incident Name and Location<br>Monessen Riverfront Development Proj |   |                                 | Municipality<br>Monessen       |
| Located adjacent to Koppers Ind. in Monessen                                |   |                                 | County<br>WESTMORELAND         |

|   |                              |   |
|---|------------------------------|---|
| Name, Address or Responsible Official<br>KOPPERS INDUSTRIES - GREG SHAMITKO | Interviewed<br>GREG SHAMITKO | Title<br>Director ENV. Affairs  |
| 345 Donner Ave  | Telephone<br>724-684-1009    | Interviewed?<br><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| Responsible Official<br>for Koppers - Jim Bunkhart Plant Mgr.               |                              |   |

|              |  |
|--------------|--|
| REMARKS      | Due to a complaint filed with the Department concerning Koppers Ind.'s proper handling & removal of plastic piping used to drain contaminated water & coal tar from two storage tanks located on the Riverfront Development Project owned by Westmoreland County Redevelopment Authority. An inspection of the site was conducted. Initially, the liquid decanted from the tanks was processed thru Koppers water treatment process and discharged via WPOES to the Monongahela River. The coal tar <sup>remaining</sup> was then <del>pumped</del> <sup>GRAVITY FLOW</sup> thru the plastic piping to the Koppers facility for re-use. The removal <sup>process</sup> occurred during the fall of 1999 and Koppers employees began disconnecting the plastic piping this week. Numerous lengths of plastic pipe were stacked between two concrete walls adjacent to the creyand next to Koppers facility. The pipes contained residues of coal tar which eventually began to seep out onto the surface of the ground. |
| VIOLOGATIONS | Illegal disposal of hazardous waste (K087) in violation of Act 97 Sections 403(b)(9) & 410(1) & 410(4) of the Solid WASTE MANAGEMENT ACT.  |

|  |                             |          |
|--|-----------------------------|----------|
| Sample Collected?<br><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO | Sample Numbers<br>2576, 155 | Analyses |
|--|-----------------------------|----------|

|  |  |                          |                           |
|--|--|--------------------------|---------------------------|
| Inspector Name<br>SABOCHICK              | Inspector Signature<br>             | Headquarters<br>McMurray | Date<br>1/11/01           |
| Person Interviewed Name<br>GREG SHAMITKO | Signature of Person Interviewed<br> | Title                    | Telephone<br>724-684-1009 |

This document is official notification that a representative of the Department of Environmental Protection inspected the above mentioned facility. The findings of the inspection are shown above and on any attached pages. Violations discovered as a result of this inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses, review of pertinent documents and further investigation. Notification will be forthcoming if such violations are discovered.



|   |  |
|---|--|
| Facility/Incident Name and Location<br>Monessen Runway Rent Development Project | Municipality<br>Monessen<br>County<br>Westmoreland |
|---|--|

### ADDITIONAL REMARKS

Due to cold temperatures seepage was minimal. The tan  
 when spilled should be considered a hazardous waste "K087."  
 Koppers should initiate clean-up as soon as possible to  
 prevent further discharge of tan from the pipes. Since  
 temperatures are predicted to rise. The piping and  
 any soil contaminated K087 waste should be placed  
 in a lined roll-off container, ~~and~~ covered & labeled.

Another area of concern was identified in front of the  
 SABRE Demolition trailer where plastic piping appears  
 broken. Koppers Official James Burkhardt contends that  
 the pipe was broken by another party. Koppers  
 should also remove these sections of piping and  
 any contaminated soil and handle as K087 haz waste.

Koppers indicated clean-up should be completed by  
 Friday - 1/12/01.

A follow-up inspection will be conducted.

|                                   |   |                 |
|-----------------------------------|---|-----------------|
| Inspector Name<br>George SABOTECK | Inspector Signature<br> | Date<br>1/11/01 |
|-----------------------------------|---|-----------------|





McMurray District Office

Pennsylvania Department of Environmental Protection

3913 Washington Road  
McMurray, PA 15317

724-941-7100

**NOTICE OF VIOLATION**

CERTIFIED MAIL NO. 7099 3400 0012 4535 8703

Gregory Shamitko  
Koppers Industries  
345 Donner Ave.  
Monessen, PA 15062

Re: Koppers Industries  
Monessen  
Westmoreland County  
PAD #98L577082

Dear Mr. Shamitko:

As a result of a January 11, 2001 inspection at the Monessen Riverfront Development Project, the Department of Environmental Protection (DEP) has determined that you are in violation of the Solid Waste Management Act, Act of July 7, 1980, P.L. 380, No. 97, 35 P.S. Sections 6018.101 et seq., and the rules and regulations promulgated thereunder as follows:

- A. Failure to properly contain and store K087 hazardous waste which had seeped onto the surface of the ground from the plastic piping used to transfer coal tar from tanks located on Westmoreland County Redevelopment Property to the Koppers facility. This action is in violation of Sections 403(b)(a), 610(1), and 610(4) of the Solid Waste Management Act.

DEP recommends the following actions be taken: Place all plastic piping and K087 contaminated soil in lined roll-off boxes and arrange for proper disposal.

Please respond to this Notice of Violation stating what actions have been taken by Koppers to abate the problem.

This Notice of Violation is neither an order nor any other final action of the Department of Environmental Protection. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions, please contact me at 724-941-7100.

Sincerely,

George Sabocheck  
Waste Management

